

EXHIBIT 1

**Plaintiff's More Definite Statement as to
Defendant Rabita Trust**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

2. Rabita Trust is a charitable organization which was created to organize the repatriation and rehabilitation of stranded Pakistanis (Biharis) from Bangladesh. Founded in 1988, the trust fund was started jointly by the government of Pakistan and the Saudi-based charity, the Muslim World League (Rabita al-Alam-e-Islami). Rabita Trust received the majority of its funding from the Muslim World League, a world-wide Islamic organization heavily funded by the Saudis, but which has also been involved with terrorism.

3. Rabita Trust was initially granted 250 million Riyals from the Pakistani government as well as 50 million Riyals from the Muslim World League to help relocate some 250,000 displaced Pakistani refugees in Bangladesh. In its 15 years of existence, the Rabita Trust has only managed to relocate a few hundred Biharis.

Liability

4. On October 12, 2001, President George W. Bush's Executive Order designated Defendant Rabita Trust as a Specially Designated Global Terrorist Entity and the Treasury Department froze its assets.

5. The Rabita Trust should not be examined in a vacume but rather as part of a large network of organizations that provide a financial base for Osama Bin Laden and Al-Qaeda. Rabita is a “sister organization” of the International Islamic Relief Organization (or “IIRO”); both are subsidiaries of the Muslim World League (or “MWL”). MWL has numerous connections to al Qaeda operatives; indeed, Osama bin Laden’s brother-in-law, Jamal Khalifa, opened a Muslim World League office in Pakistan and an IIRO office in the Philippines for the use of al Qaeda. The IIRO was involved with the 1993 World Trade Center bombing, the plot to destroy the Lincoln Tunnel and the Brooklyn Bridge, the plot to assassinate former President William Jefferson Clinton and Pope John Paul II, the plot to blow up twelve American airplanes simultaneously, and the 1998 Embassy bombings in East Africa.

6. Therefore, it is through the actions not only of the Rabita Trust and its employees, but also those of both the MWL and the IIRO, that one can fully ascertain the extent to which the Rabita Trust is one cog in larger Al-Qaeda financing machine that funds Bin Laden’s radical and intolerant agenda under the guise of humanitarian aid.

7. Indeed, when one considers the number of top Rabita Trust executives that are actively involved in financing Al-Qeada, such as Wael Julaidan, Abdullah al Obaid and Abdullah Omar Naseef,; as well the well established body of evidence against the IIRO and MWL, it is clear that the Trust’s ties to Al-Qaeda are too widespread and intimate to be coincidental or unintentional.

8. The Head of Rabita Trust is a known al Qaeda member. A Treasury Department press release issued when Rabita Trust’s assets were frozen indicated that:

Rabita Trust is headed by Wa’el Hamza Jalaidan, one of the founders of al-Qaida with bin Laden. He is the logistics

chief of bin Laden's organization and fought on bin Laden's side in Afghanistan.

9. According to an authoritative biography of bin Laden and the original members of al Qaeda, the head of Rabita Trust, Wa'el Jalaidan, fought alongside Osama bin Laden and championed his cause. Detailing how al Qaeda's key founders fought against the Soviets in Afghanistan during the Soviet-Afghan war of the 1980s, this account is noted for its accuracy and clarity. The biography, written by a fellow compatriot of bin Laden, noted:

One of the men who led the Arab Afghan Jihad forces came from one of the wealthiest Saudi families; he was influenced by the Afghan struggle, who would live together with them and sacrifice everything for the Afghani jihad. This man was Osama bin Laden, a young, tall man who followed Dr. Abdullah Azzam to fight in Afghanistan. Another Saudi joined together with them; his name was Wa'el Jalaidan, a US student who was studying agriculture and left to fight jihad in Afghanistan.

These three: Osama bin Laden (a.k.a. 'Abu Abdallah'), Dr. Abdullah Azzam (a.k.a. Abu Muhammed), and Wa'el Jalaidan (a.k.a. Abu Al-Hassen al-Madani), gathered together in December 1979 to create the new Islamic revolution in Afghanistan.

10. Authorities claim that it was during his time in Peshawar that Jalaidan became involved with the individuals that would eventual evolve into al-Qaeda, as he joined forces with bin Laden's mentor, the late Palestinian scholar Abdullah Azzam, in an organization referred to as the Alkifah Refugee Center. The group served primarily to provide financial and logistical support to the mujihadeen in Afghanistan.

11. Accordingly, Jalaidan was labeled as a SDGT on September 6, 2002, by President Bush and his assets were frozen.

12. Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV. When referring to the assassination of al-Qaeda co-founder Abdullah Azzam, bin Ladin stated that "We were all

in one boat, as is known to you, including our brother, Wael Julaidan."

13. U.S. authorities have also alleged personal contacts between Julaidan and senior military lieutenants of Bin Laden, including Dr. Ayman al-Zawahiri and now captured terrorist mastermind Abu Zubaydah. Under interrogation by U.S. authorities, the latter claimed that he accompanied Julaidan from Pakistan to Kandahar, Afghanistan during the summer of 2000. Moreover, according to Abu Zubaydah, upon his arrival in Kandahar, Julaidan met personally with Usama bin Laden and former Al-Qaeda military chief Mohammed Atef (a.k.a. Abu Hafs Al-Masri).

14. Julaidan also has extensive links to Al-Qaeda activity in Bosnia Herzegovina. A BBC report in April 2000 cited a confidential memo sent to UN police forces in Kosovo titled "Secret: US office only-Release to UNMIK." The document named Ratia Trust/MWL representative Wa'el Julaidan as an associate of Osama bin Laden and stated that Julaidan had directly assisted Bin Laden in moving "money and men to and from the Balkans."

15. U.S. counterterrorism investigators have discovered a letter under the MWL/IIRO letterhead among numerous al-Qaeda documents recovered in Bosnia-Herzegovina. The letter, dating from the late 1980's, summarized a meeting held between al-Qaeda leaders and representatives of Muslim charitable organizations in which the attendees ultimately agreed to launch "attacks" from MWL offices in Pakistan.

16. Through two of its officers, Rabita has also been connected to the "SAAR" network of charities, which is a convoluted, overlapping arrangement of non-profit and for-profit organizations that serve or have served as front-groups for al Qaeda and extremist Islamic terrorist organizations. The offices of the SAAR Network were raided

by the FBI in March of 2002 because of their extensive ties to Osama Bin Laden and the Al-Qaeda terrorist network.

17. Abdullah Omar Naseef (or “Naseef”) also served as Secretary-General of the Muslim World League during the time he created Defendant Rabita Trust and has attempted to spread Muslim World League offices around the world. Part of his global efforts are found in his involvement in a SAAR Network charity. Naseef is an officer of Makkah al-Mukarramah, Inc., registered in Virginia as a non-profit organization that is under investigation for its ties to Al-Qaeda.

18. Rabita Trust shares a second officer with the SAAR Network through its board member Abdullah al Obaid, who serves as an officer of Sanabel al-Kheer and the Muslim World League located at SAAR’s main offices at 555 Grove Street in Herndon, Virginia. Defendant Abdullah Omar al-Obaid is unique in that, not only is he an officer at the Muslim World League and the SAAR Network, but he is also the Deputy General Manager at one of Sulaiman al-Rajhi’s largest businesses, al-Watania Poultry in Saudi Arabia. Al-Watania Poultry has branches worldwide and in the United States.

19. Al-Rajhi and his family have played a central role in financing Osama Bin Laden’s terrorist network. They have provided substantial aid to al-Qaeda through the Co-Defendant Al-Rajhi Banking & Investment Corporation as well the above mentioned SAAR Foundation.

20. Rabita Trust is also closely linked to Osama Bin Laden through Mohammed Jamal Khalifa, brother in law of Osama bin Laden and MWL/IIRO employee. As with Julaidan, Khalifa emerged as a facilitator of terrorism during the Soviet/Afghan war. After the

Soviet withdrawal, Khalifa used the MWL and the IIRO to aid Al-Qaeda in its transition from a local insurgency into a global terrorist operation.

21. Khalifa set up an IIRO chapter in the Philippines in Zamboanga City through which al-Qaeda was able to instigate and fund militant Muslims in the region. More specifically, IIRO helped facilitate the growth of the Moro Islamic Liberation Front (MORO) as well as the Abu Sayyaf Group (ASG). According to a former ASG member, less than 30% of IIRO's funds went towards legitimate endeavors while the rest was used to buy weapons and equipment for ASG.

22. While in the Philippines, the IIRO provided material assistance to al-Qaeda's efforts to plan and implement attacks in and against the United States, including the 1993 WTC bombing as well as plots to destroy the Brooklyn Bridge, the Lincoln Tunnels, assassinate the Pope, and blow up 12 American airlines over the Pacific ocean.

23. An affidavit from FBI Special Agent Robert Walker details Khalifa's involvement with the key actors in the first WTC bombing and brings to light the extent to which Khalifa and the IIRO were in the process of funding Al-Qaeda's efforts to carry out additional attacks.

24. Upon his arrest in San Francisco in December 1994, Khalifa was in possession of several incriminating items that link him to WTC bombers Ramzi Yousef and Wali Khan Amin Shah:

"he (Khalifa) had Wali Khan's beeper number in his phonebook as well as in his electronic organizer. Khalifa also had: (i) an entry for a number in Pakistan which Yousef had called from Manila; (ii) an entry from the cellular telephone of an associate of Wali Khan and Yousef (which Yousef also had in his phonebook) and (iii) an entry for Usama Bin Laden. Khalifa also possessed documents referring to the assassination of bishops and bombings of churches (at a time when evidence gathered in the investigation indicates that Wali Khan and others were planning to kill the Pope during a planned January 1995 visit to the

Philippines and after churches had already been bombed in the Philippines in the preceding year.”

25. Ramzi Yousef, the Al-Qaeda operative who was the mastermind behind the WTC bombing in 1993, was also in possession of several items indicating that he was in contact with Khalifa:

“his (Ramzi) phonebook had a listing for Khalifa... Kahn had provided him with the business card of Khalifa in case he needed help... Yousef had a listing for ‘Khalifah’ in both his encrypted computer file and in his telephone/address book. The encrypted log also contained a Post Office box for Mohammed Khalifah in Lebanon. Yousef’s encrypted phone book listed the telephone number of Khalifa’s charity.”

26. In addition, Walker states that Omar Abdel Rahman, the leader of an al-Qaeda linked terrorist organization named Al Gamaa al Islamia, had in his possession upon his arrest a “business card for Mohammad Jamal Khalifa.” Rahman was eventually convicted for conspiring to destroy the Brooklyn Bridge and the Lincoln Tunnel.

27. The IIRO was also implicated in the 1998 Embassy bombings in Kenyan and Tanzania. Wadih El-Hage, a former personal secretary to bin Laden , had several IIRO business cards in his domicile at the time of his arrest in Kenya. The cards are labeled “Kingdom of Saudi Arabia” below the IIRO’s name. Among those listed on the IIRO business cards are:

- Hussian Ali Al-Ghanam, labeled “the Jubail Area Manager & Africa Consultant.”
- Abdunnassir S. Osman, the “Orgn. Office Executive Manager—Kenya.”
- Abdullah Mohammed Al Sagheer, on the “External Projects Committee.”

Sagheer’s card also displays “Muslim World League above IIRO’s name.

28. El-Hage’s IIRO business cards were in distinguished compamy, as El-Hage’s domicile also contained business cards for several other charities that have strong ties

with al-Qaeda. El-Hage had contact information and business cards for the Benevolence International Foundation, a Saudi charity that the U.S. government believes to have direct ties to al-Qaeda. Also in his possession were business cards from Al-Haramian, a Saudi charity of which the U.S. designated two of its branches terrorist entities. In addition, El-Hage had business cards for Help African People and the above mentioned Mercy International—both of whom were directly involved in financing the bombings in East Africa. Shortly after the bombings, the Kenyan government cancelled the registration of Mercy International, Al-Haramain, Help African People, the Muslim World League (IIRO) and the Abdul Aziz Al Ibrahim Foundation.

29. On January 7, 1999, a Bangladeshi national by the name of Sayed Abu Nasir, a member of the U.S. designated terrorist group Lashker-e-Taiba. Lashker-e-Taiba that is closely associated with al-Qaeda, was arrested in India with detonators and more than four pounds of explosives. According to Cecilia Dugger's article "Anti-U.S. Plot in India is Foiled in the January 21, 1999 edition of The International Herald Tribune, Karnal Singh, the Deputy Commissioner of Police in India, stated that Nasir was ordered to launch an attack on the United States Consulate in Madras by Sheikh Al-Gamdin, President of the IIRO/IRO in Asia.

30. Although it can not be proven that Nasir received orders directly from Al-Gamdin, it is clear that Nasir worked for the IIRO in India and that he attended an IIRO meeting at which Al-Gamdin was also present.

31. One of the most explicit condemnations of the IIRO occurred during a deportation hearing for Mahmoud Jaballah in Canada in 2002.

32. Jaballah worked for the IIRO in Pakistan for three years prior to working as the principal of the Um Al Quara Islamic School in Toronto.

33. In December 2001, Jaballah was deported from Canada as a result of his involvement with al-Jihad, a terrorist outfit that was led by Ayman al-Zawhiri, al-Qaeda's second in command. More specifically, the Canadian government proved that Jaballah's fingerprints matched those of Mahmoud Said, "an Egyptian member of Al Jihad wanted for document forging, bomb making and other terrorist activities."

34. A French Intelligence report released shortly after 9/11 lists the IIRO as an al-Qaeda financier and makes specific mention of the IIRO's UK office and its affiliations with Islamic radicals:

"The last category of backers that Al Qaeda can count upon for support are welfare organizations. The financial report pointed a finger chiefly at the International Islamic Relief Organization (IIRO), which was also mentioned in the Jordanian intelligence memo.... "IIRO works out of 3 Worchester Street in Oxford in the U.K. It collects money and distributes the funds it raises to Rabitat Alam Islami, the Saudi Islamic League [Muslim World League] that operates in 90 countries, including Chechnya and Bosnia, with a 5 billion budget."

35. 3 Worchester Street is the same address as the International Development Foundation (IDF), a charity heavily affiliated with Defendant Khaled bin Mahfouz. Mahfouz has ties to al-Qaeda through the National Commercial Bank, the Pathfinder Group and the Muwafaq Foundation.

36. The IIRO office in Britain was shut down in 1997 and British authorities concluded that the IIRO did perform legitimate humanitarian operations in England; however, given the connection to Mahfouz and the IDF, IIRO's financial activities in the UK were most likely associated with al-Qaeda.

37. The Benevolence International Foundation (BIF) was classified as a Specifically Designated Global Terrorist by the U.S. Treasury Department on November 19, 2002 and its assets were frozen the following winter. The IIRO is tied to BIF's illegal activities through both Khalifa's personal contacts as well as its branch in Canada.

38. BIF's Executive Director in the United States, Enaam Arnaout, was implicated in 2002 in an FBI affidavit as having "a relationship with Usama bin Laden and many of his key associates dating back more than a decade." The affidavit also maintains that "BIF is an organization that al-Qaeda has used for logistical support, including the movement of money to fund its operations." Arnaout has been arrested and BIF's assets have been frozen.

39. In his affidavit, Special Agent Walker notes the close connection Khalifa had with senior BIF leadership. Upon his arrival in the United States in 1994, Khalifa was traveling with BIF employee and former Arab-Afghan fighter Mohammad Bayazid. Bayazid is an associate of Al-Qaeda operative Jalaiden. In the East Africa bombing trial, a former member of al-Qaeda recalled how he once went with Bayazid to receive a cylinder of purported uranium.

40. The Canadian Branch of IIRO retains its own ties to al-Qaeda. Mohammed Khatib is the Director of IIRO in Canada. The Canadian chapter of BIF was co-founded by Khatib and the above mentioned Arnaout. Khatib became the Executive Director of BIF-Canada while continuing to work as an employee of IIRO and the Muslim World League. After BIF-USA's assets were frozen, BIF-Canada claimed its affiliation with BIF's US branch did not extend beyond their shared name. BIF-Canada, however, solicited donations for

BIF-USA, as its website provided a direct link to a pledge form on the site run by BIF's U.S. office. In addition, BIF-USA's website listed BIF-Canada as its sister organization.

41. Therefore, the IIRO was officially linked to BIF's-USA office through its head officer in Canada as well as through Khalifa's own personal contacts.

42. No one element, no one accusation of funding is taken as being determinative of the assessment that the Rabita Trust has been providing support to terrorists through its actions. Rather, when considering the number of sources, number activities and length of time, the totality of evidence provides reason to believe that Rabita Trust, in cooperation with the IIRO, the MWL, and the SAAR Foundation, has knowingly funded an Al-Qeada.